

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-1 Please provide the following information:

- a. Documents, correspondence, memoranda, business plans, marketing plans, forecasts, sales targets, and any and all other written materials including electronic as well as conventional paper correspondence and documents pertaining to the sales and marketing activities being and/or to be carried out jointly between Verizon MA and Verizon Long Distance (VLD) on behalf of or for the benefit of VLD with respect to the acquisition of residential and small business customers for interLATA long distance services offered by VLD.
- b. The number, or an estimate of this number if an actual is not available, of inbound calls received by all Verizon MA customer service functions (including but not limited to customer service, billing, and repair representatives) from its customers during the calendar years 1999, 2000, and an estimated number for 2001.
- c. The number of VLD Massachusetts customers obtained to date.
- d. The estimated percentage of VLD customers that will be obtained via Verizon MA through joint marketing of local and long distance service, in the first and fifth years following VLD's receipt of authorization to provide long distance service in Massachusetts.
- e. The number of Verizon MA customer service representatives employed by Verizon MA on January 1, 2001 and the number of customer service representatives planned to be employed as of January 1, 2002. Please also provide planning materials relied on to arrive at the budgeted headcount.

**ITEM:** AG-VZ 3-1  
(cont'd)

- f. Describe and provide all materials used for training Verizon MA customer service representatives to handle VLD service inquiries and orders for long distance service.
- g. Describe and provide all documents pertaining to the manner in which the costs of Verizon MA's participation in joint marketing with VLD will be identified and allocated to VLD. Indicate specifically how such costs are to be tracked, how common overhead costs will be allocated, and the specific accounting transactions or payment mechanisms that will be used to compensate Verizon MA for any and all sales, marketing or other services it furnishes to VLD.

**REPLY:**

Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-2 Please provide copies of all marketing scripts that Verizon MA representatives are using and/or will use to joint market local and long distance services. For each script, identify the customer category for which it is/will be used. For purposes of example only and not to limit the response to these categories, this would include scripts for (i) marketing to new customers calling to subscribe to local exchange service, (ii) marketing to existing customers calling to change or add a service, (iii) marketing to existing customers calling to change their long distance service, (iv) marketing to existing customers calling with service or billing inquiries, and (v) marketing to customers calling with a service trouble report or inquiry.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-3 Please provide all copies of all marketing scripts used by Verizon-New York representatives to joint market the long distance services of Verizon-New York and Verizon Long Distance in New York. For each script, identify the customer category for which it will be used, as described in AG-VZ-3-2, above.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-4 Please provide copies of all written materials (including materials published on a website) that Verizon MA currently or plans to make available to callers in response to any inquiry regarding long distance service, and identify the individuals, including their title and company, that supervised the creation of the written materials and the company, Verizon MA, VLD, or any other Verizon affiliate, that paid for the production of the written materials.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

VZ # 80

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-5 Please provide drafts of all current and planned television and radio advertising of VLD services by either Verizon MA or VLD; identify the broadcast stations that will air the advertisements and indicate which company, Verizon MA or VLD, has purchased or will purchase the air time for the advertisements and the total dollar amount budgeted for broadcast advertising.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31)**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-6 Please provide copies of all scripts, instructions, and other materials that are or that are planned to be used by Verizon MA representatives to respond to requests for VLD services by potential customers who subscribe to a local exchange carrier other than Verizon MA.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-7 Please identify all local exchange carriers in Massachusetts other than Verizon MA from which VLD intends to or already has agreed to purchase switched carrier access services, and specify precisely what types of switched access services will be purchased from each such carrier.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.



**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-8 Please provide copies, both draft and final versions, of scripts and all related materials that Verizon MA representatives use or will use to seek permission to use a caller's "CPNI" for purposes of marketing VLD services.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-9 Please provide the following information:

- a. The compensation to be paid to Verizon MA for each sale of VLD service by a Verizon MA representative.
- b. The compensation to be paid to a Verizon MA representative for each sale of VLD service by that representative. Please specify whether the compensation received by individual representatives is in the form of money, other goods and services, or other in-kind compensation.
- c. Explain how the sales of VLD services by Verizon MA representatives will be monitored and tabulated by Verizon MA, and how individual Verizon MA representative's sales of VLD services will be monitored for compensation purposes.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-10 Please provide copies of the draft and final notices of VLD services that will appear in the Customer Guide section of Verizon MA's White Page Directories. Please provide the expected publication dates of all White Pages Directories where the notices will appear.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-11 Please provide estimates of VLD's expected share of the Massachusetts long distance market, by both number of customers and revenue, at the end of the first and fifth years of operation and include with this response all documentation supporting the calculation of these estimates, including but not limited to all documents, studies, and information relied on, the identification of any consultant or other third party retained to provide input, prepare the estimates, or otherwise participate in the calculation of the estimate, and any product prepared by the consultant or third party in this regard.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-12

- a. Will VLD provide long distance service to CLEC local service business customers and will VLD provide long distance service to CLEC local service residential customers?
- b. To the extent not provided in response to 1(a), describe with specificity the manner in which VLD will market and sell long distance services to customers of CLECs.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

VZ # 88

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-13

- a. In New York, does VLD provide long distance services to customers of local exchange carriers other than Verizon-New York, how many of VLD's New York customers currently obtain their *local exchange service* from a carrier other than VLD?
- b. Does VLD provide long distance service in New York to customers served by independent (*i.e.*, non-Verizon) incumbent local exchange carriers and if so indicate which ILEC customers are being offered VLD service.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-14 For each month since the Federal Communications Commission authorized VLD to provide in-region long distance services in New York, please provide separately the number of Verizon-New York customers and the number of all other customers that subscribed to VLD's long distance service during that month and state whether the customer was obtained through joint marketing by Verizon-NY on behalf of VLD or through some other marketing channel. For those customers obtained via joint marketing by Verizon-NY, identify the purpose for the customers' original contact with Verizon-NY, for example but not limited to (i) calling to subscribe to local exchange service, (ii) calling to change the long distance carrier, (iii) calling to order a modification or addition to local service, or (iv) calling to report to a service problem.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-15 Please provide copies of all documents, including scripts used by Verizon MA's customer service representatives, used by Verizon MA to joint market services provided by any of its affiliates, including but not limited to Verizon Advanced Data, Inc., Verizon On-Line Internet, and Verizon Wireless.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

VZ # 91



**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-16 Please provide copies of all Verizon MA employee guidelines, practices and policies pertaining to the solicitation of customers who have changed their service provider from Verizon MA to a CLEC in an attempt to "win-back" such customers to Verizon MA.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-17 Please provide copies of all standard form "win-back" correspondence or promotional materials used by Verizon MA to solicit customers who have changed their service provider from Verizon MA to a CLEC.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

VZ # 93

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-22 The following questions are in reference to the attached letter (“Attachment A”) appearing on the Verizon.com website: “DS1 and DS3 Unbundled Network Elements Policy”, July 24, 2001 (downloaded on August 1, 2001 from [http://www22.verizon.com/wholesale/frames/generic\\_frame\\_east/0,2656,industry\\_letters,00.html](http://www22.verizon.com/wholesale/frames/generic_frame_east/0,2656,industry_letters,00.html)).

- a. The letter states (para. 2) that “... Verizon is not obligated to construct new Unbundled Network Elements where such network facilities have not already been deployed for Verizon’s use in providing service to its wholesale and retail customers.” Please provide a citation to whatever legal authority Verizon relies upon to support that statement.
- b. The letter states (para. 2): “Moreover, although Verizon has no legal obligation to add DS1/DS3 electronics to available wire or fiber facilities to fill a CLEC order for an unbundled DS1/DS3 network element...” Please provide a citation to whatever legal authority Verizon relies upon to support that statement.
- c. Does Verizon MA believe that the statements referenced in parts a. and b. above apply to its operations in Massachusetts? If the answer is anything other than an unqualified yes, explain in detail how its legal obligations in Massachusetts differ from those holding in other states, relative to each of these statements.
- d. Has Verizon or Verizon MA ever issued a statement or document concerning its obligations and policies concerning the

**ITEM:** AG-VZ 3-22  
(cont'd)

construction of new DS1 and/or DS3 facilities for the provision of retail services, including but not necessarily limited to Flexpath T-1 exchange access lines/trunks? If such a statement or document has been issued, please provide a copy of that statement or document.

- e. If the response to d. is that no such statement or document has been issued, please provide any internal Verizon or Verizon MA practices pertaining to the provisioning of retail DS1/DS3 services including but not limited to Flexpath T-1 exchange access lines/trunks in situations where facilities are not initially available to fulfill the order. If not such written practice or practices exist, provide a statement, corresponding to the one from the Verizon website cited above, describing Verizon MA's practices with respect to the construction of facilities required in order to fulfill a retail order.

**REPLY:**

Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-23 Please provide the following information in the same format as Verizon used in preparing its response to AG-VZ-1-11. For each month beginning in January 2000 and extending to the most recent month for which data is available, provide the following information.

- a. The total number of orders for Flexpath T-1 exchange access lines/trunks that were rejected due to a determination by Verizon MA that facilities were not available.
- b. The total number of orders for T-1 intraLATA Special Access lines that were rejected due to a determination by Verizon MA that facilities were not available.
- c. The total number of orders for T-1 UNEs that were rejected due to a determination by Verizon MA that facilities were not available.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-24 Please provide the same information as requested in AG-VZ-3-24 on a wire center basis.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

VZ # 100

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-25 Please provide any written practice(s) or, if no such practice exists, provide a narrative explaining Verizon MA's practices and policies relative to the rearrangement and reuse of existing facilities when facilities are initially unavailable at a particular customer location to fulfill an order for a service requiring a T-1 facility. Indicate whether the same or different practices apply in the case of retail service orders placed by end users, orders for special access placed by carriers, or orders for T-1 UNEs placed by carriers, including Flexpath T-1, IntraLATA Special Access T-1, and UNE T-1. In your response, please address the following circumstances:

- a. The T-1 common equipment has no spare ports/slots, but one or more of the ports/slots is assigned to a circuit that is no longer in use because service has been discontinued. Under the Company's applicable policies and procedures, could the technician reuse such a port/slot in order to fulfil the new order? Describe any differences that might occur as between orders for Flexpath T-1, IntraLATA Special Access T-1, and UNE T-1.
- b. There is no unassigned T-1 copper or fiber distribution facility available to fulfill the order, but one or more T-1 distribution facilities along the route passing the customer location is assigned to a circuit that formerly served a customer at a nearby location, but is no longer in use because that service had been discontinued. Under the Company's applicable policies and procedures, could the technician reuse such a distribution facility in order to fulfil the new order? Describe any differences that might occur as between orders for Flexpath T-1, IntraLATA Special Access T-1, and UNE T-1.

**REPLY:**

Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

VZ # 101



**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-26 Please identify and provide copies of all documents that provide guidelines to Verizon MA outside plant technicians concerning the Company's policies and procedures for rearrangement and/or reuse of facilities to provide any of the three categories of T-1 service listed in the previous request.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

VZ # 102

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-27 Please describe the procedures Verizon New Media Services, Inc. ("VNMS") (the Verizon subsidiary that publishes Verizon MA's phone books), and Verizon MA follows (or would follow) assuming that a CLEC requested Verizon MA to have the CLEC business customer's street address unpublished, while having the customer's name and phone number published. How would Verizon MA and VNMS:

- a. Confirm to the CLEC receipt of the CLEC's order as stated above?
- b. Process the CLEC request?
- c. Correct the CLEC customer's listing in Verizon MA's directories if the CLEC customer's street address is published?
- d. Resolve a complaint from the CLEC and the CLEC's customer if Verizon MA publishes the street address contrary to the CLEC request order?

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-28 How many phone directories did VNMS publish last year in Massachusetts?

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

VZ # 104